

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GEORGE THOMAS,	:	VIOLATIONS:
a/k/a "George Thomas, El"		18 U.S.C. § 1344 (bank fraud - 2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 57282.
2. From on or about October 3, 2003, to on or about December 11, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

GEORGE THOMAS,
a/k/a "George Thomas, El,"

knowingly executed and attempted to execute a scheme to defraud Citizens Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. It was part of the scheme that GEORGE THOMAS, a/k/a “George Thomas, El,” pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks at Citizens Bank. He presented the checks and fraudulent identifications which identified him as the payees on the checks or the account holders for the accounts on which the checks were drawn and then asked the bank to cash the checks.

It was further a part of the scheme that:

4. By cashing the checks in other people’s names, GEORGE THOMAS, a/k/a “George Thomas, El,” stole approximately \$70,759.55.

5. GEORGE THOMAS, a/k/a “George Thomas, El,” obtained fake state driver’s licenses in the names of other people to use as identification. In some instances, defendant THOMAS then presented this fake identification to Citizens Bank along with a check payable to the name on the fraudulent driver’s license. In other instances, he obtained a counter check from Citizens Bank payable from the account of the person whose name was on the fraudulent driver’s license. Defendant THOMAS then fraudulently endorsed the checks with the fake name and received cash from the bank. Each of the checks listed below was cashed in this manner:

DATE	CHECK NO.	PURPORTED CHECK MAKER	CHECK PAYEE	STATE OF FRAUDULENT ID	AMOUNT
10/3/2003	1753929992	“Wordsworth Academy”	J.D.	New Jersey	\$961.32
10/3/2003	1753929899	“Wordsworth Academy”	J.D.	New Jersey	\$865.30

DATE	CHECK NO.	PURPORTED CHECK MAKER	CHECK PAYEE	STATE OF FRAUDULENT ID	AMOUNT
10/3/2003	1753929892	“Wordsworth Academy”	J.D.	New Jersey	\$832.49
10/3/2003	1763950699	“Wordsworth Academy”	J.D.	New Jersey	\$951.63
10/3/2003	1753929992	“Wordsworth Academy”	J.D.	New Jersey	\$965.32
10/3/2003	1753959899	“Wordsworth Academy”	J.D.	New Jersey	\$925.14
10/22/2003	1918999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,204.37
10/22/2003	1758999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,305.19
10/22/2003	1718999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,219.53
10/22/2003	1718999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,219.53
10/22/2003	1718999862	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$1,390.49
10/25/2003	928	“F.A.”	T.W.	Pennsylvania	\$1,452.00
10/25/2003	108	“S.R.”	T.W.	Pennsylvania	\$4,120.52
10/29/2003	925999	“Precision Communication, Inc.”	T.W.	Pennsylvania	\$1,280.53
11/13/2003	99958999877	“The Vanguard Group”	R.L.	Pennsylvania	\$2,308.40
11/13/2003	99958999879	“The Vanguard Group”	R.L.	Pennsylvania	\$2,214.36
11/13/2003	99958999875	“The Vanguard Group”	R.L.	Pennsylvania	\$2,304.39
11/13/2003	99958999889	“The Vanguard Group”	R.L.	Pennsylvania	\$2,216.38

DATE	CHECK NO.	PURPORTED CHECK MAKER	CHECK PAYEE	STATE OF FRAUDULENT ID	AMOUNT
11/13/2003	99958999874	“The Vanguard Group”	R.L.	Pennsylvania	\$2,236.44
11/13/2003	99958999878	“The Vanguard Group”	R.L.	Pennsylvania	\$2,213.34
11/13/2003	99958999899	“The Vanguard Group”	R.L.	Pennsylvania	\$2,316.48
11/13/2003	99858999899	“The Vanguard Group”	R.L.	Pennsylvania	\$2,302.54
11/13/2003	99868999899	“The Vanguard Group”	R.L.	Pennsylvania	\$2,246.53
11/13/2003	99878999899	“The Vanguard Group”	R.L.	Pennsylvania	\$2,238.60
11/16/2003	199881999894	“The Vanguard Group”	R.L.	Pennsylvania	\$1,814.60
11/16/2003	199881999895	“The Vanguard Group”	R.L.	Pennsylvania	\$1,830.60
11/16/2003	counter check	R.L.	“cash”	Pennsylvania	\$2,000.00
11/16/2003	counter check	R.L.	R.L.	Pennsylvania	\$3,000.00
11/16/2003	counter check	R.L.	R.L.	Pennsylvania	\$5,000.00
11/16/2003	122	“S.R.”	R.L.	Pennsylvania	\$4,000.00
12/11/2003	counter check	J.H.	“cash”	Pennsylvania	\$5,000.00
12/11/2003	9878999899	“Bartash Printing Inc.”	J.H.	Pennsylvania	\$2,234.19
12/11/2003	9883999899	“Bartash Printing Inc.”	J.H.	Pennsylvania	\$2,231.43
12/11/2003	9889999899	“Bartash Printing Inc.”	J.H.	Pennsylvania	\$2,230.43

All in violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Sovereign Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 29950.
2. From on or about November 7, 2003, to on or about April 27, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

**GEORGE THOMAS,
a/k/a “George Thomas, El,”**

knowingly attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. It was part of the scheme that GEORGE THOMAS, a/k/a “George Thomas, El,” opened a Sovereign Bank account under the false name of “E.J.,” by using a false identification in the name of “E.J.” so that he could deposit counterfeit and otherwise unauthorized checks into the account and then gain access to cash.

It was further a part of the scheme that:

4. GEORGE THOMAS, a/k/a “George Thomas, El,” obtained a fake identification, that is, Pennsylvania driver’s license ending in 3094, in the name of E.J. in order to facilitate his crime. He then presented this fake identification to Sovereign Bank on or about

November 7, 2003, in order to fraudulently open a Sovereign Bank account ending in 4264 in the name of E.J.

5. On or about April 26, 2004, GEORGE THOMAS, a/k/a “George Thomas, El,” fraudulently deposited at a Sovereign Bank ATM machine in Philadelphia, Pennsylvania, counterfeit check # 2416, which purported to be payable from “SCC Restaurant LLC, DBA: Moshulu” to “E.J.,” in the amount of \$4,468.10, which bore the false endorsement of “E.J.”

6. On or about April 27, 2004, GEORGE THOMAS, a/k/a “George Thomas, El,” fraudulently deposited at a Sovereign Bank ATM machine in Yeadon, Pennsylvania, counterfeit check # 2416, which purported to be payable from “SCC Restaurant LLC, DBA: Moshulu” to “E.J.,” in the amount of \$4,261.87, which bore the false endorsement of “E.J.”

All in violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**